

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165
T: 212.792.0046 • E: Jason@levinepstein.com

July 1, 2024

Via Electronic Filing

The Hon. Judge Gabriel W. Gorenstein, U.S.M.J.
U.S. District Court, Southern District of New York
40 Foley Square
New York, NY 10007

MEMORANDUM ENDORSED

Re: *Cordero v. The Table at Redeye Inc. et al*
Case No.: 1:24-cv-00144-GWG

Dear Honorable Magistrate Judge Gorenstein:

This law firm represents Plaintiff Joseph Cordero (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves to request an extension of time to file a motion for settlement approval, pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015) (“*Cheeks*”) from July 2, 2024 to, through and including, August 2, 2024.

This is the first request of its nature and is made on consent of counsel for Defendants Otis Banks, Peter Cecere, Marni Halasa, The Table at Redeye Inc. (the “Defendants”). If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that parties require additional time to fulfil a condition-precedent of the long-form settlement agreement, prior to *Cheeks* submission.

In light of the foregoing, it is respectfully requested that the Court extend the parties’ time to file a motion for settlement approval, pursuant to *Cheeks* from July 2, 2024 to, through and including, August 2, 2024.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein

Joshua D. Levin-Epstein, Esq.
60 East 42nd Street, Suite 4700
New York, New York 10165
Tel. No.: (212) 792-0046
Email: Joshua@levinepstein.com
Attorneys for Defendants

Extension to August 2, 2024, granted.

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge

July 2, 2024